

# EXHIBIT B

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW JERSEY  
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5 MDL No. 16-2738 (FLW) (LHG)

6 IN RE: JOHNSON & JOHNSON  
7 TALCUM POWDER PRODUCTS  
8 MARKETING, SALES PRACTICES,  
9 AND PRODUCTS LIABILITY LITIGATION  
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14 The remote video deposition of WILLIAM LONGO,  
15 Ph.D., taken via Zoom videoconference on  
16 May 2, 2024, commencing at approximately  
17 11:20 a.m., before Lois Anne Robinson,  
18 Certified Realtime Reporter.  
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<p style="text-align: right;">Page 46</p> <p>1 A That is a true statement.</p> <p>2 Q Okay.</p> <p>3 A Now, we have a chart of all our J&amp;J</p> <p>4 testing that has been provided to defendants. If</p> <p>5 I were to stack up the notebooks that -- you</p> <p>6 know, just -- just taking a look at the -- all</p> <p>7 the historic -- the J&amp;J historical samples, where</p> <p>8 we have 19- -- you know, 1960, 1970, 1980, 1990,</p> <p>9 2000s up to 2002 or 2003, and, before that, it</p> <p>10 was maybe 50-some samples from eBay, et cetera.</p> <p>11 And then after, you know, Johnson &amp; Johnson, the</p> <p>12 only additional samples we did -- because, you</p> <p>13 know, Johnson &amp; Johnson was in bankrupt [sic] for</p> <p>14 two years -- was the -- you know, the Alphadet --</p> <p>15 MS. O'DELL:</p> <p>16 Valadez?</p> <p>17 A -- Valadez -- excuse me -- was a</p> <p>18 sample, and a couple more for the -- for the MDL,</p> <p>19 for some of the containers for the -- you know,</p> <p>20 for this project. There's nothing else. We</p> <p>21 provided all the -- you know, all the selected</p> <p>22 area electron diffraction patterns, all the ADXA.</p> <p>23 There's nothing else.</p> <p>24 MR. EWALD:</p>	<p style="text-align: right;">Page 48</p> <p>1 it right there.</p> <p>2 So we consider SOPs confidential and</p> <p>3 company records. We don't turn over SOPs, and</p> <p>4 not too many experts do.</p> <p>5 Q Sorry, Doctor. I didn't follow -- I</p> <p>6 got the last part. But the part before that, you</p> <p>7 mentioned you're one of the few labs, something</p> <p>8 about turnover? I wasn't sure what you were</p> <p>9 talking about. Sorry.</p> <p>10 A I think we're one of the few labs that</p> <p>11 put a very extensive materials and methods</p> <p>12 section in just to go through each step of what</p> <p>13 we do. And using those materials/methods</p> <p>14 section, anybody could duplicate the analysis.</p> <p>15 Q And when you say materials and methods</p> <p>16 section, you're referring to the materials and</p> <p>17 methods section in your expert report; right?</p> <p>18 MS. O'DELL:</p> <p>19 Reports.</p> <p>20 A In every report we have. From</p> <p>21 receiving the sample to weighing it out, to --</p> <p>22 you know, through the -- out of the -- you know,</p> <p>23 through the muffle furnace to get rid of the</p> <p>24 organics, to weighing it, then going and doing</p>
<p style="text-align: right;">Page 47</p> <p>1 Q All right. Looking at request 31 in</p> <p>2 what we marked as Exhibit 6, it asks for all</p> <p>3 standard operating procedures (SOPs) maintained</p> <p>4 by your laboratory for testing bulk materials for</p> <p>5 asbestos by PLM, TEM, and SEM.</p> <p>6 And, Doctor, my question to you is:</p> <p>7 Does MAS maintain any standard operating</p> <p>8 procedures for the testing of talc samples by PLM</p> <p>9 for the presence of chrysotile?</p> <p>10 A No. We haven't finished the standard</p> <p>11 operating procedures because we keep doing</p> <p>12 research and changing slight -- slight</p> <p>13 conditions, so -- until we finally have.</p> <p>14 But what I may -- but what we do</p> <p>15 provide, in every analysis we do have chrysotile</p> <p>16 has materials and methods section that anybody</p> <p>17 can follow, and it doesn't really have --</p> <p>18 If we had written SOPs for every time</p> <p>19 we made a change, it wouldn't really change</p> <p>20 any -- it -- you know, it really wouldn't give</p> <p>21 any additional information. That's why I think</p> <p>22 we're one of the few laboratories, when they do</p> <p>23 an analysis, they actually put in every step they</p> <p>24 do. And for any changes, then we, you know, show</p>	<p style="text-align: right;">Page 49</p> <p>1 the heavy liquid spin time on the centrifuge, the</p> <p>2 name -- name and -- on what products we're using</p> <p>3 so they can buy the same products, the same</p> <p>4 centrifuge, if they'd like, et cetera, et cetera.</p> <p>5 So it's not inhibiting, in my opinion,</p> <p>6 any other experts from trying to do this work.</p> <p>7 And it must -- it must be okay, because</p> <p>8 Alan Seagrave has duplicated this method for</p> <p>9 using right out -- protocols right out of our</p> <p>10 paper, right out of our reports.</p> <p>11 Now, he didn't find chrysotile, and --</p> <p>12 but he never complained that there wasn't enough</p> <p>13 information for him to do this work, and that's</p> <p>14 a -- you know, that's a defense expert that</p> <p>15 actually did the CSM method.</p> <p>16 Q And I apologize. I'm not familiar with</p> <p>17 that. How -- how recently was that?</p> <p>18 A I have a report of his floating around,</p> <p>19 a couple of them. I don't know if I can put my</p> <p>20 hands on them or not. But if my client asks me,</p> <p>21 I will certainly look for it.</p> <p>22 Q And in looking at those reports where</p> <p>23 he didn't find chrysotile, what is your response</p> <p>24 to his conclusions?</p>

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1 about the MAS LLC HLS analysis for amphibole  
2 asbestos by TEM, and you lay out your procedure  
3 for that. Correct?  
4 A Correct.  
5 Q Okay. And then we have MAS LLC HLS  
6 analysis for chrysotile asbestos by PLM, and you  
7 lay out the procedure that MAS was using for this  
8 at the time. Correct?  
9 A Correct.  
10 Q What aspect --  
11 Well, I'll just go line by line.  
12 Stain 200 milligrams of cosmetic talc  
13 with betadine, 2 percent iodine solution, filter  
14 stain talc material and wash in alcohol/Di-water.  
15 Do you still use that as part of MAS's  
16 HLS analysis for chrysotile asbestos by PLM?  
17 A No. As I discussed earlier in this  
18 deposition, that the iodine worked really well  
19 for the 1866b NIST chrysotile standards because  
20 of the very large bundles that were in there.  
21 Q Okay.  
22 A But when we got to looking for it for  
23 the size of the bundles of chrysotile that was in  
24 the cosmetic talc, the 2 percent iodine solution

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1 I did not absorb enough to it so it gave it any  
2 ability to see it. So it just didn't work. And  
3 I never mention that -- other scientists who came  
4 to the same conclusion.

5 And we were using betadine, but the  
6 method called for pure iodine. The problem with  
7 pure iodine, one, in order to get it, you have to  
8 fill out a lot of paperwork for the DEA because  
9 it's a precursor in meth productions.

10 And, two, once you made up the  
11 solution, it only had about a two- -- a three- or  
12 four-day shelf life. And we weren't working on  
13 it all day long. And, again, we never used the  
14 iodine for identification. It was just supposed  
15 to help, and it didn't work. So we dropped that  
16 pretty quick after this.

17 Q And the 2.72g/cc HLS, is that the same  
18 that you use today for the heavy liquid?

19 A Today -- I'll just give you an update  
20 on the very last one we did for Johnson &  
21 Johnson. And this one --

22 And this was the Kirch on 2-15-2024.  
23 We used 2 .65.

24 Q Okay. And do you recall in the 1974

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1 Colorado School of Mines, did they use 2.72?  
2 A No. They never used 2.72.  
3 Q Okay.  
4 A They said less than 2.65.  
5 Q Okay.  
6 A But our initial trying everything, that  
7 was being -- that gave the most. And it was  
8 said -- you know, we had -- we had some technical  
9 difficulties trying to repeat their stuff.  
10 But, no, they didn't use 2.72  
11 initially. Well, it's not what they put in their  
12 final protocol.  
13 Q Centrifuge at 500 rpm for 5 minutes,  
14 then 1800 rpm for 5 minutes, is that still MAS  
15 LLC HLS analysis for chrysotile asbestos by PLM?  
16 A For this sample, we did it for 72 hours  
17 at 21 degrees Celsius without breaking.  
18 Q And at the time Colorado School of  
19 Mines was doing analysis in 1974, did they use  
20 the same centrifuge time?  
21 A I'm not sure they published in there  
22 what centrifuge time they were using.  
23 This particular centrifuge time was  
24 used by Reynolds in the -- the Windsor project.

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1 where they hired him to look for amphiboles in  
2 their product -- I mean in the -- in the -- in  
3 their Vermont talc. And he found actinolite, and  
4 he says he believes the other was anthophyllite.  
5 He ran standards, and he showed that it was in  
6 there. So I borrowed their centrifuge time.  
7 Q Okay. The part about fine tweezer,  
8 remove stained chrysotile bundles from filter and  
9 place on glass slide, MAS doesn't do that  
10 anymore -- right? -- because they don't stain the  
11 particles. Right?  
12 A That went pretty quickly. That  
13 didn't -- that didn't last long.  
14 Q Okay. And when you say "have validated  
15 detection limit of approximately 0.0001 percent  
16 by weight fibers per gram of talc," you're  
17 talking about, quote, validation procedures that  
18 were done internally by MAS; right?  
19 A Correct.  
20 Q Okay. And yet we've gone through the  
21 various discrepancies, some of the discrepancies  
22 between the MAS method and the Colorado School of  
23 Mines method, but you, earlier today and in the  
24 past have called this, what you were doing, just

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